

EXHIBIT P

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**NOTICE OF DEPOSITION PURSUANT TO
FED. R. CIV. P. 30(b)(6) TO META
PLATFORMS, INC.**

Date: November 14, 2025
Time: 9:30 a.m., Local Time
Location: Boies Schiller Flexner LLP
44 Montgomery Street, Floor 41
San Francisco, CA 94104

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, in accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure, Meta Platforms, Inc. (“Meta”) is hereby directed to designate one or more officers, directors, managing agents, or other persons who consent to testify and are most knowledgeable and competent to testify regarding the following topics and related or supporting facts occurring between January 1, 2016 and the present (the “Relevant Period”):

Topic 1: Meta’s uploading, distribution, and/or making available of copyrighted works via its torrenting of the same.

Topic 2: The document beginning with the Bates stamp Meta-Kadrey-SC-000932, including but not limited to file paths “/private/home/nikbash/data/libgen_tst” and “/private/home/nikbash/data/libgen_all,” and any testimony or representations by Meta that may be impacted by Meta-Kadrey-SC-000932 or the content stored at those file paths.

Topic 3: Meta’s blocking and un-blocking/approvals in connection with Library Genesis and/or Anna’s Archive, including approval for Anna’s Archive and torrenting of content from Library Genesis, Z-Library, Internet Archive, and Duxiu. *See, e.g.,* Meta_Kadrey_00238411, Meta_Kadrey_0023896.

Topic 4: Meta’s IP Policy Analysis and Recommendation and “the prior decision w.r.t the content from Anna’s Archive,” as reflected in Meta_Kadrey_00238411, Meta_Kadrey_0023896.

Topic 5: All “mirroring” of datasets related to Library Genesis, Anna’s Archive, Z-Library, Internet Archive or Duxiu, including “for archival or LLM purposes.” *See* Meta_Kadrey_00238411, Meta_Kadrey_0023896.

Topic 6: All “approved usages” or “usages” related to Library Genesis, Anna’s Archive, Z-Library, Internet Archive or Duxiu. *See, e.g.,* Meta_Kadrey_00238411, Meta_Kadrey_0023896, Meta_Kadrey_0023873.

Topic 7: The origin and timing of updates, changes, and content in Meta_Kadrey_00238411 and all other AIDC dashboards related to Library Genesis, Anna’s Archive, Z-Library, Internet Archive, or Duxiu.

Topic 8: The terms, fields, and content of the AIDC dashboards for any and all AIDC dashboards related to Library Genesis, Anna’s Archive, Z-Library, Internet Archive, and Duxiu.

1 This deposition will be taken before an officer qualified to administer oaths. The deposition will
2 be recorded by stenographic and audiovisual means.

3
4 Dated: October 29, 2025

By: /s/ Maxwell V. Pritt

Maxwell V. Pritt

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CERTIFICATE OF SERVICE

I, the undersigned, am employed by Boies Schiller Flexner LLP. My business address is 1401 New York Avenue, Washington, DC 20005. I am over the age of eighteen and not a party to this action.

On October 29, 2025, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6) TO META PLATFORMS, INC.**

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 29, 2025.

/s/ Jay Schuffenhauer
Jay Schuffenhauer

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